

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT

December 2, 2021

for the
Southern District of Texas

Nathan Ochsner, Clerk of Court

United States of America)

v.)

Leticia SOSA-Medina COB: MX YOB: 1967)

Giovanni TELLEZ COB: US YOB: 2002)

Case No. 7:21-mj-2525-1

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 11/09/2021 in the county of Hidalgo in the Southern District ofTexas, the defendant violated 8 U. S. C. § 1324

, an offense described as follows:

Knowing and in reckless disregard of the fact that aliens have come to, entered, or remained in the United States in violation of law, concealed, harbored and shielded from detection such aliens in a residence located near Penitas, Texas.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint approved by AUSA M. Redavid

Submitted by reliable electronic means, sworn to
and attested to telephonically per Fed. R. Cr. P.4.1,
and probable cause found on:

/s/Fatima Alkhatib

Complainant's signature

Fatima B. Alkhatib, HSI Special Agent

Printed name and title

Date: December 2, 2021 at 11:14 p.mCity and state: McAllen, Texas

Judge's signature

J Scott Hacker, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On November 15, 2021, Homeland Security Investigations (HSI) Special Agents (SAs) received information that a concerned citizen had reported that two undocumented aliens (UDAs) were mistakenly dropped off at her mother in law's residence and had stated that they had been held at a location against their will and charged \$2600 ransom for their release.

On November 22, 2021, HSI SAs interviewed Teresa Elizabeth Cuellar-Rojas, a citizen and national of El Salvador who made the following non verbatim recorded statement. Cuellar-Rojas was charged \$11,500 in smuggling fees to enter the U.S. Cuellar-Rojas was picked up from the river by an unknown male and transported to a stash house where she stayed for approximately three to four days. Cuellar-Rojas was subsequently transported to several stash houses one of which she identified as the residence of Leticia SOSA-Medina and Giovanni TELLEZ where there were approximately seventeen to eighteen UDAs. Cuellar-Rojas identified SOSA-Medina from a six-pack photo lineup as the owner and resident of the stash house who provided the UDAs with food and instructed them not to make any noise and not to leave the bedroom where they were harbored. Cuellar-Rojas identified TELLEZ from a six-pack photo lineup as the stash house caretaker and resident who patdown the UDAs for cell phones and weapons upon arrival to the stash house and who in possession of a machete. Cuellar-Rojas was subsequently transported to approximately two more stash houses and eventually ended up at the residence where the concerned citizen contacted police.

On November 22, 2021, HSI SAs interviewed Henry Alberto Lopez-Tepata, a citizen and national of El Salvador who made the following non verbatim recorded statement. Lopez-Tepata was charged \$11,500 in smuggling fees to enter the U.S. Lopez-Tepata was picked up from the river by an unknown male and transported to a stash house where he stayed for approximately three to four days. Lopez-Tepata was subsequently transported to several stash houses one of which he identified as the residence of Leticia SOSA-Medina and Giovanni TELLEZ where there were approximately seventeen to eighteen UDAs. Lopez-Tepata identified SOSA-Medina from a six-pack photo lineup as the owner and resident of the stash house who provided the UDAs with food and instructed them not to make any noise and not to leave the bedroom where they were harbored. Lopez-Tepata identified TELLEZ from a six-pack photo lineup as the stash house caretaker and resident who patdown the UDAs for cell phones and weapons upon arrival to the stash house and who was in possession of a machete. Lopez-Tepata was subsequently transported to approximately two more stash houses and eventually ended up at the residence where the concerned citizen contacted police.

On December 2, 2021, HSI SAs conducted a search warrant on SOSA-Medina and TELLEZ's residence in Penitas, the same stash house that Cuellar-Rojas and Lopez-Tepata identified as being one of the stash houses they were harbored in. Both SOSA-Medina and TELLEZ were apprehended and transported for interviews. Ledgers, hand drawn maps of the Border Patrol checkpoint in Falfurrias, weapons and foreign identification documents from different countries were found within the residence and seized.

On December 2, 2021, HSI SAs interviewed SOSA-Medina who made the following post Miranda, non-verbatim recorded statement. SOSA-Medina admitted to harboring the UDAs at her residence and providing them with food and water. SOSA-Medina instructed the UDAs not to leave the room they were in and to not make any noise.

On December 2, 2021, HSI SAs interviewed TELLEZ who made the following post Miranda, non-verbatim recorded statement. TELLEZ admitted to harboring the UDAs at his residence for approximately \$100 each. Some of the UDAs remained at his residence while others were divided and transported amongst various unidentified individuals. TELLEZ has harbored UDAs at his residence on several occasions. TELLEZ used a machete to scare the UDAs into staying in the room they were in. TELLEZ eventually transported the remaining UDAs from his residence to various locations.